

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

BERNADINE T. GRIFFITH,

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Plaintiff,

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v.

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Civil Action No. 03-12573-EFH

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ONEBEACON INSURANCE COMPANY,
ONEBEACON AMERICA INSURANCE
COMPANY, MICHAEL A. SISTO, and
KAREN ALLEN HOLMES,

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Defendants.

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**MEMORANDUM OF DEFENDANTS ONEBEACON INSURANCE COMPANY AND
ONEBEACON AMERICA INSURANCE COMPANY IN OPPOSITION TO
PLAINTIFF'S MOTION TO EXTEND TIME FOR RETAINING AN ATTORNEY, AND
IN THE ALTERNATIVE, TO DENY FURTHER EXTENSIONS**

Defendants OneBeacon Insurance Company and OneBeacon America Insurance Company ("Defendants") hereby oppose Plaintiff's Motion to Extend Time for Retaining an Attorney, and, in the alternative, oppose any further extensions to retain counsel beyond August 17, 2006. The grounds for this opposition are as follows:

1. On May 23, 2006, this Court ordered Plaintiff to retain a new attorney on or before July 17, 2006. This order was entered after this Court allowed Plaintiff's prior counsel to withdraw on the eve of trial.

2. Plaintiff's motion offers no legitimate basis for extending the July 17th deadline for retaining new counsel. Plaintiff only asserts that she "has discovered the interviewees need a few days to review the issues of this case" [sic]. Plaintiff's motion does not address why, in the nearly sixty (60) days since this Court entered its order on the retention of new counsel, Plaintiff has been unable to complete any necessary interviews and review of issues.

3. In the alternative, should this Court be inclined to grant the extension, this Court should further order that Plaintiff be afforded no additional extensions to retain an attorney beyond the requested deadline of August 17, 2006.

For all the above reasons, Defendants pray that Plaintiff's Motion to Extend Time for Retaining an Attorney be denied, or in the alternative, that Plaintiff be afforded no further extensions to retain counsel beyond August 17, 2006.

Respectfully submitted,

ONEBEACON INSURANCE COMPANY and
ONEBEACON AMERICA INSURANCE
COMPANY,

By their attorneys

/s/Robert P. Morris

Keith B. Muntyan

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Dated: July 27, 2006

CERTIFICATE OF SERVICE

I, Robert P. Morris, hereby certify that on July 27, 2006, this document filed electronically through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to any persons indicated as non-registered participants.

/s/Robert P. Morris

Robert P. Morris